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Shane Escamilla, Stephen Mollet,
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICKIE SLAUGHTER,

Plaintiff,

vs.

ESCAMILLA, et al.,

Defendant.

Case No. 3:16-cv-00457-MMD-WGC

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE JOINT PRETRIAL
ORDER
(Second Request).**

Defendants, Shane Escamilla, Stephen Mollet, Sandra Rose-Thayer, and Melissa Travis, (collectively “Defendants”) by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Peter E. Dunkley, Deputy Attorney General, hereby submit this Unopposed Motion to Extend Time to File a Joint Pretrial Order. Counsel for the Defendants and counsel for the Plaintiff Rickie Slaughter have conferred and exchanged e-mails regarding settlement discussions, while circulating drafts of the Joint Pretrial Order. In light of the ongoing settlement discussions, Defendants, with Slaughter’s approval, request an additional five weeks¹ to submit a proposed Joint Pretrial Order.

MEMORANDUM OF POINTS AND AUTHORITIES

I. ARGUMENT

Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its

¹ Four week lands on the Independence Day Holiday, recognized on Friday, July 3, 2020.

extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

In this case, on February 19, 2020 the Court granted Slaughter's request for extension of time to file the proposed joint pretrial order. (ECF No. 140.) Since that time, there has been addition to additional motion practice regarding discovery, along with the procedural administrative overhead related to COVID-19. The parties have been diligent and have been exchanging settlement offers, and though no settlement has been reached, offers are pending. The requested five (5) week extension of time will permit sufficient time for the parties to consider the pending proposed settlement terms and continue the settlement dialogue as necessary with the goal of a resolution without the need for a jury trial. *See* Fed. R. Civ. P. 1 (Federal Rules construed to accomplish a just and inexpensive determination of the action).

For these reasons, Defendants respectfully request, with Slaughter's approval, a five (5) week extension of time from the current deadline of June 5, 2020, to file the Proposed Joint Pretrial Order, with a new deadline to and including Friday, July 10, 2020.

DATED this 5th day of June 2020.

AARON D. FORD
Attorney General

By: /s/ Peter E. Dunkley
PETER E. DUNKLEY, Bar No. 11110
Deputy Attorney General

Attorneys for Defendants

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: June 5, 2020

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 5th day of June 2020, I caused to be deposited for mailing, a true and correct copy of the foregoing, **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE JOINT PRETRIAL ORDER (Second Request)**, on the following:

Mr. Nicholas R. Shook
4865 Fiesta Lakes Street
Las Vegas, Nevada 89130

/s/ Caitie Collins

An employee of the
Office of the Attorney General